

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Fitchburg Gas and Electric Light Company

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D.T.E. 02-22

**PETITION OF BOSTON EDISON COMPANY, CAMBRIDGE ELECTRIC
LIGHT COMPANY, COMMONWEALTH ELECTRIC COMPANY AND NSTAR
GAS COMPANY REQUESTING LIMITED PARTICIPANT STATUS**

Pursuant to 220 C.M.R. 1.03, Boston Edison Company (“Boston Edison”), Cambridge Electric Light Company (“Cambridge”), Commonwealth Electric Company (“Commonwealth”) and NSTAR Gas Company (collectively, the “NSTAR Companies”), hereby petition the Department of Telecommunications and Energy (the “Department”) to participate in the above-captioned proceeding as Limited Participants. In support of their petition, the NSTAR Companies state the following:

1. Boston Edison is a Massachusetts electric company, as defined in G.L. c. 164, § 1, providing retail service in Massachusetts and is subject to the regulatory jurisdiction of the Department. Boston Edison provides retail electric service to customers throughout eastern Massachusetts.
2. Cambridge is a Massachusetts electric company, as defined in G.L. c. 164, § 1, providing retail service in Massachusetts and is subject to the regulatory jurisdiction of the Department. Cambridge provides retail electric service to customers in the City of Cambridge, Massachusetts.
3. Commonwealth is a Massachusetts electric company, as defined in G.L. c. 164, § 1, providing retail service in Massachusetts and is subject to the regulatory

jurisdiction of the Department. Commonwealth provides retail electric service to customers throughout southeastern Massachusetts, including Cape Cod and Martha's Vineyard.

4. NSTAR Gas Company is a Massachusetts gas company, as defined by G.L. c. 164, §1 distributing gas in cities and towns located throughout eastern Massachusetts.

5. The NSTAR Companies' usual place of business is:

NSTAR Electric & Gas Company
800 Boylston Street
Boston, MA 02199

6. On April 16, 2002, Fitchburg Gas and Electric Light Company ("Fitchburg" or the "Company") filed a request with the Department to approve a performance-based regulation plan for the Company's gas operating division. The Department docketed the request as D.T.E. 02-22.

7. In conducting adjudicatory hearings, the Department "may allow any person showing that he may be substantially and specifically affected by the proceeding to intervene as a party in the whole or any portion of the proceeding, and allow any other interested person to participate by presentation of argument orally or in writing, or for any other limited purpose," as the Department may order. G.L. c. 30A, § 10(4); 220 C.M.R. § 1.03(1)(b).

8. The Department's investigation in this proceeding may raise substantial ratemaking and related issues that are common to other gas and electric companies in Massachusetts, including the NSTAR Companies.

9. In addition, good cause exists for allowing this petition because: (1) the procedural conference for the proceeding has not yet been held; (2) the NSTAR Companies' Limited Participant status will not jeopardize the efficiency of the Department's investigation in any material way; and (3) counsel for the NSTAR Companies has contacted counsel for Fitchburg concerning their interest in this case and can represent that Fitchburg does not object to the NSTAR Companies being granted Limited Participant status.
10. Accordingly, the NSTAR Companies seek to participate in this proceeding as Limited Participants with rights to receive copies of all pleadings, discovery requests and responses and to file brief(s) in accordance with the procedural schedule to be established by the Department.

WHEREFORE, for the reasons stated above, the NSTAR Companies respectfully request that this Petition to Participate as a Limited Participant in the above-referenced proceeding be granted. The NSTAR Companies hereby notice the appearances of the undersigned counsel. They request that one copy of all notices, testimony, pleadings and correspondence pertaining to this proceeding be directed to counsel as shown below.

Respectfully submitted,

**BOSTON EDISON COMPANY
CAMBRIDGE ELECTRIC LIGHT COMPANY
COMMONWEALTH ELECTRIC COMPANY
NSTAR GAS COMPANY**

By Their Attorneys,

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